



**DEPARTMENT OF THE ARMY**  
**US ARMY INSTALLATION MANAGEMENT COMMAND**  
**HEADQUARTERS, US ARMY GARRISON FORT A.P. HILL**  
**18436 4TH STREET**  
**FORT A.P. HILL, VIRGINIA 22427-3114**

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12 December 2013

**MEMORANDUM FOR SEE DISTRIBUTION**

**SUBJECT: Commander's Policy Letter #39 - Managing Material Potentially Presenting an Explosive Hazard (MPPEH)**

1. Applicability. Policy applies to all personnel who live, work or train on Fort A.P. Hill.

a. All MPPEH documented as either Material Documented as an Explosive Hazard (MDEH) or Material Documented As Safe (MDAS) that is transported, stored or used within the geographical or jurisdictional boundaries of the installation. This does not apply to munitions that are to be used for their intentional purpose.

2. Proponent. Fort A. P. Hill Installation Safety Office, Explosive Safety Officer.

3. References:

a. DoDI 4140.62, Material Potentially Presenting an Explosive Hazard, 25 Nov 2008.

b. DoDM 6055.09-M-V7, DoD Ammunition and Explosives Safety Standards: Criteria for Unexploded Ordnance, Munitions Response, Waste Military Munitions, and Material Potentially Presenting an Explosive Hazard, 4 Aug 2010.

c. DA PAM 385-64, Ammunition and Explosives Safety Standards, 24 May 2011.

d. Department of Defense Explosives Safety Board Technical Paper 18, Minimum Qualifications for Unexploded Ordnance Technicians and Personnel, 20 Dec 2004.

e. FAPH Regulation 385-10, Safety and Occupational Health Program, 19 Apr 2007.

4. Purpose: Manage the process in such a manner as to prevent material from being comingled or misidentified with MPPEH or MDAS once the explosives hazards have been determined.

5. Policy.

a. Manage and control MPPEH (e.g., sorted, segregated, stored, secured) to prevent its unauthorized use, transfer or release, and to protect personnel and property from

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uncontrolled exposures to potential explosive hazards.

b. Manage MPPEH in a manner that supports operational readiness and mission requirements in accordance with DoDD 3200.15, Reference (d), and in compliance with supply chain materiel management policies Reference (b), explosives safety standards DoD 6055.09-STD Reference (e), and environmental requirements (DoDD 4715.1E; DoDI 4715.4; DoDI 4715.6; and subpart M of part 266 of title 40, Code of Federal Regulations References (f) through (i), to the fullest extent applicable.

c. By contract or other legal agreement, require compliance with MPPEH management procedures by all non-DoD entities that possess, manage, process, or provide disposition of MPPEH or MDEH for the Department of Defense.

#### 6. Responsibilities:

a. The Installation Safety Office/Explosives Safety Officer (ISO/ESO) shall:

(1) Have overall responsibility for and oversight of environmental, safety (including explosives safety), and occupational health matters related to this instruction.

(2) In coordination with the FAPH Explosives Safety Board develop and implement:

(a) MPPEH management procedures, including procedures for managing material for which the explosives safety status has been determined.

(b) Qualification standards for the DoD Components and personnel involved in storing, handling, processing (i.e., collecting, securing, sorting, segregating, inspecting, decontaminating, and demilitarizing), and transporting MPPEH.

(c) Qualification standards for non-DoD entities or individuals involved in processing MPPEH to which this instruction applies.

(3) Monitor implementation of this instruction and issue additional guidance and direction as necessary. Ensure uniform implementation of procedures.

b. All organizations or groups to which this instruction applies will:

(1) Comply with the requirements of this instruction.

(2) Control and manage MPPEH and MDEH to prevent its unauthorized use, transfer, or release. Ensure that only MDAS is released to the public.

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(3) Ensure MPPEH management procedures are applied IAW all applicable regulatory guidance and MPPEH holding areas are included in local facility threat assessments.

(4) Implement this instruction and subsequent implementing guidance by providing necessary procedures, programs, and funds.

(5) Identify personnel who have responsibilities associated with MPPEH, MDEH, and the determination of MDAS and ensure:

(a) Their training meets the requirements established in DoDI 4140.62 or US Army explosives safety regulations or, when appropriate, DDESB Technical Paper 18. They must be experienced in the identification, processing, and safe handling of used and unused military munitions and any potential explosive hazards that may be associated with the specific MPPEH or MDEH being received.

(6) Conduct an explosives risk evaluation before receiving, managing, or processing MPPEH or MDEH or allowing a non-DoD entity or individual under their control to perform these functions. This explosives risk evaluation process will evaluate the adequacy of their management controls (e.g., training, oversight, record keeping) and operations (e.g., processing methods, equipment, storage facilities).

(7) Ensure that contracts or other legal agreements with non-DoD entities for MPPEH possession, management, and processing require non-DoD entities to comply with MPPEH management procedures and DoD 4145.26-M.

(9) Ensure that the storage, handling, processing, and transportation of MPPEH and MDEH are IAW DoD 6055.09-STD.

## 7. Procedures:

### a. MPPEH Certification:

(1) Certification will only be performed by personnel who are qualified and authorized to sign a certification of MPPEH as safe or hazardous and are designated in writing by the commanding officer or agency director.

(2) Certification as safe by visual inspection requires a 100% inspection by one individual (certifier), followed by an independent 100% re-inspection by a second individual (verifier).

(3) The following certification signature combinations may be used when visual inspections are employed:

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(a) The first inspector (certifier) and the second inspector (verifier) both perform 100% inspections, and both sign the MPPEH certification document(s).

(b) The individuals providing the 100% inspections must submit the signed inspection form with the results of their inspections to the Fort A. P. Hill Explosives Safety Officer to ensure the veracity of the chain-of-custody for the material.

(4) Maintain Chain-of-Custody: This refers to the activities and procedures taken throughout the inspection, re-inspection, documentation and transportation process to maintain positive control of MPPEH to ensure the veracity of the process. This includes activities from the time of collection through final disposition. Methods to ensure chain of custody veracity include, but are not limited to, identifiers, permanent, weatherproof container markings or labels; locked or sealed and secured containers, and checklists.

(5) Certification as safe by technical methods other than 100% visual inspection requires a post-processing sampling inspection with one signature by an authorized person. Technical methods to process MPPEH for safe certification include thermal processing, e.g. hot fire flashing, hot gas decontamination, and chemical treatments approved by the US Army Technical Center for Explosives Safety (USTACES). Quality control and quality assurance methods include thermocouples, explosive-treated coupons, infrared thermometers, swab samples, and colorimetric methods. The post-processing sampling inspection may range from an approved written plan for one item, to a robust quality control and quality assurance program, depending on the scope and hazards of the effort.

(6) Certification as hazardous by 100% visual inspection. When an initial inspection by a qualified and authorized person determines that the material is hazardous, a second independent inspection is not required, and the certification may be prepared by the inspector or by another qualified and authorized individual.

(7) Visual inspections may be augmented by probes, sensors, color reagents, or other aids, but are effective only if the person performing the inspection is properly trained and certified for the specific type of MPPEH being examined and aids employed.

b. MPPEH Certification Documentation:

(1) Certification Documentation is performed using the attached form, DD Form 1348-1A, Issue Release/Receipt Document.

(2) This form requires the full name of the certifier and verifier, their rate, MOS or title, rank or grade, organization name and address and telephone number. This information must be typed, stamped or legibly printed.

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(3) Containers of certified material shall have permanent marking and labeling. Copies of the completed and signed certification documentation shall accompany the shipment.

(4) The original signed certificate shall remain with the generator. The FAPH Garrison Safety office is the primary repository of explosives safety records and will keep copies of the signed forms for five years. The FAPH Garrison Safety Office shall provide the FAPH Environmental Division with copies of the signed forms.

c. MPPEH Storage:

(1) Appropriate storage facilities will be selected and/or developed to ensure positive control of MPPEH until it is properly disposed of.

(2) Storage facilities, whenever feasible or practical, will be located inside the confines of the designated range training area. Request for MPPEH storage sites will be reviewed and approved by the FAPH Range Officer, FAPH Environmental Officer, the FAPH Safety Office and the FAPH Fire Inspector. Locations of MPPEH storage sites will be maintained in the garrison's Master plan and GIS data-base.

(3) Controls will include fencing with lockable gates, buildings with lockable doors, barriers to segregate materials, materials to cover materials to prevent exposure to or collection of precipitation, decals or markings on the containers to minimize the quantity and time MPPEH is accumulated and retained at any location.

d. MPPEH Demilitarization and Turn-in to DRMO:

(1) Demilitarization is often a separate requirement from safe certification, and safe certification often precedes demilitarization. Demilitarization emphasizes removing the capability to reuse munitions for their original purpose, and meeting trade security requirements.

(2) When using DRMO for disposition of MPPEH, documentation must be provided according to DRMO guidance IAW DOD 4160.21-M (series), DOD 4160.21-M-1 (series), and other DLA guidance. Current DLA guidance requires MPPEH inert certification/verification documentation for all disposal/recycling actions of AEDA and range residue or explosive contaminated property, including small arms. In addition, DRMO has certain citizenship requirements. Certification and/or verification of MPPEH as safe require dual signatures on the transfer document. The first signature (referred to by DRMO as the certifier) may be either DOD or contractor personnel. The second signature (referred to by DRMO as the verifier) must be a DOD personnel and a U.S. citizen. Where a U.S. Government contract requires contractor verification (in addition to certification), this requirement may be waived, however, appropriate DOD quality

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assurance controls must be established.

(3) The following statement may be used in place of the statement contained in DD Form 2271 and DD Form 1348-1: "This certifies and verifies that the AEDA residue, Range Residue and/or Explosive Contaminated Property listed has been 100% properly inspected and to the best of our knowledge and belief is inert and/or free of explosives or related material".

e. Release of MPPEH: MPPEH will not be sold or transferred for the purpose of sale, unless it is certified and verified as having an explosives safety status of safe (inert), or certified as to the explosion hazard the material is known or suspected to present. MPPEH certified as hazardous may only be transferred or released to a qualified receiver.

f. Recycling MPPEH Through Commercial Recyclers:

(1) Only the following materials are eligible to be recycled through commercial vendors: expended small arms ammunition cartridge cases .50 caliber and smaller, and mixed metals gleaned from range clearance, e.g. fragments and shrapnel.

(2) All MPPEH, such as expended small arms cartridge cases and mixed metals gleaned from range clearance, must be certified and verified safe before transfer to the QRP for direct sale or to DRMO for sale to reimburse the QRP.

(3) Commercial firms that may receive expended small arms ammunition cartridge cases or mixed metals gleaned from range clearance must have personnel that are trained at a minimum to do the following: recognize eligible material; verify signatures on all turn-in documents against the current list of personnel authorized to certify as safe; visually inspect certified eligible material and recognize potential explosive safety hazards; and respond properly if an unsafe condition is identified.

(4) In addition to the safe certification, the following statement must be included in the documentation associated with the MPPEH. "Purchasers are cautioned that articles or substances of a dangerous nature may remain in the property regardless of the care exercised to remove same. The U.S. Government assumes no liability for damages to property of the purchaser or for personal injury, disability or death of the purchaser, its employees, or to any other person arising from or affiliated with the purchase, use or dispositions of this material. The purchaser shall hold the U.S. Government harmless from any and all such demands, suits, actions, or claims arising from or otherwise relating to the purchase of this material."

g. MPPEH Transportation:

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(1) Material that has been certified/verified safe (degree of explosion hazard) may be shipped over public transportation routes as inert material. Certification documentation must accompany the shipment. If the shipment contains hazardous materials other than explosives, proper U.S. Department of Transportation (DOT) documents, such as a manifest or bill of lading must accompany the shipment.

(2) MPPEH that has NOT been certified safe, or has been certified hazardous (degree of explosion hazard 1X-3X) shall not be transported or shipped over public transportation routes unless determined safe for transport by personnel qualified in EOD, or personnel who the commanding officer or responsible authority certifies as technically qualified to make such a determination. These personnel will provide a signed "Safe to Ship certification" and DOT documents that must accompany the shipment. MPPEH that cannot be shipped in accordance with an existing hazard classification must not be transported over public transportation routes until interim hazard classification is obtained from USATCES.

h. Reporting MPPEH incidents:

(1) The FAPH Garrison Safety office shall be notified immediately of any incidents involving MPPEH that results in death or injury of personnel and/or damage to property.

(2) The FAPH Garrison Safety office shall be notified within 4 hours of the discovery of the unauthorized transfer or release of uncertified MPPEH, a break in the chain of custody, mingling of MMPEH, MDEH and MDAS or transfer or release of MPPEH that presents an unintentional hazard to a qualified receiver.

8. Training: All garrison departments, tenant commands, contractors and transient military units and government agencies that manage, handle, accumulate and turn-in MPPEH shall be trained and qualified in the identification of explosive hazards, the safe handling of used and unused military munitions, and be able to analyze operational risks and implement safety requirements.

(1) Personnel shall not perform either certification or verification until they demonstrate or provide proof of the following knowledge, skills and abilities and the person in charge of their organization appoints them in writing. Such appointments must be kept current and shall be provided to the ISO and Environmental Office;

(2) Be able to ensure compliance with applicable Federal, DoD and Army safety regulations, standards and policies and enforce site-specific procedures and requirements;

(3) Have procedures to identify, document, report and ensure completion of all corrective actions to ensure all explosives actions comply with applicable requirements;

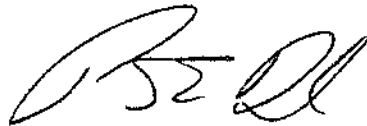
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(4) Procedures to process, inspect, verify and document material as either MDEH or MDAS; and be able to control MPPEH, MDEH and MDAS while on FAPH property;

(5) Procedures to implement and maintain a chain of custody until MDEH or MDAS is released from DOD control.

9. POC is the Garrison Safety Office/Explosives Safety Officer (804) 633-8269.

A handwritten signature in black ink, appearing to read 'P. E. Dargle', is positioned above the printed name.

PETER E. DARGLE  
LTC, AR  
Commanding

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